REMARKS

Claims 1 through 6 are currently pending in the application.

This amendment is in response to the Final Office Action of March 17, 2005.

35 U.S.C. § 102(b) Anticipation Rejections

Anticipation Rejection Based on Wojnarowski et al. (U.S. Patent 5,104,480)

Claims 1 through 6 were rejected under 35 U.S.C. § 102(b) as being anticipated by Wojnarowski et al. (U.S. Patent 5,104,480).

Applicant asserts that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Turning to the Wojnarowski et al. reference, described is a laser ablation process substantially roughening the surface of polymer dielectrics on metal layers and used to repair open traces in printed circuit structures. Nowhere in the Wojnarowski et al. reference is there any description whatsoever of scanning the wafer for any reason. Nor is there any suggestion in the Wojnarowski et al. reference that any scanning is inherent in the process of repair.

Applicant asserts that the Wojnarowski et al. reference does not and cannot anticipate the presently claimed inventions of presently amended independent claims 1, 3, and 5 under 35 US.C. § 102 because the Wojnarowski et al. reference does not identically describe, either expressly or inherently, the elements of the inventions in as complete detain as is contained in the claims. For instance, Applicant asserts that the Wojnarowski et al. reference does not describe the elements of the presently claimed inventions of presently amended independent claims 1, 3, and 5 calling for "scanning the substrate for irregularities for removal", "roughening the surface of the substrate for removal of irregularities", and "roughening the surface of the substrate while removing irregularities". In contrast to the presently claimed inventions of presently amended independent claims 1, 3, and 5, the Wojnarowski et al. reference merely describes the ablation of

polymer coatings on metal layers for the formation of circuits. Such is not the presently claimed inventions.

While it is asserted in the Office Action that scanning is inherent in the Wojnarowski et al. reference process, there has been no explanation regarding any reason that scanning is inherently present in the process. Only a mere assertion has been made which is speculative. Applicant requests the citation of prior art to illustrate that scanning is present in any such repair process.

Therefore, presently amended independent claims 1, 3, and 5 are allowable as well as dependent claims 2, 4, and 6 therefrom.

Anticipation Rejection Based on Eichelberger et al. (U.S. Patent 4,894,115)

Claims 1 through 6 were rejected under 35 U.S.C. § 102(b) as being anticipated by Eichelberger et al. (U.S. Patent 4,894,115).

Applicant again asserts that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Turning to the Eichelberger et al. reference, described is a process for forming holes in a desired pattern in a polymer dielectric layer scanned repeatedly with a high energy continuous wave laser. Nowhere in the Eichelberger et al. reference is there any description whatsoever of scanning the wafer for any reason. Nor is there any suggestion in the Eichelberger et al. reference that any scanning is inherent in the process of repair.

Applicant asserts that the Eichelberger et al. reference does not and cannot anticipate the presently claimed inventions of presently amended independent claims 1, 3, and 5 under 35 US.C. § 102 because the Eichelberger et al. reference does not identically describe, either expressly or inherently, the elements of the inventions in as complete detain as is contained in the claims. For instance, Applicant asserts that the Eichelberger et al. reference does not describe the elements of the presently claimed inventions of presently amended independent claims 1, 3, and

5 calling for "scanning the substrate for irregularities for removal", "roughening the surface of the substrate for removal of irregularities", and "roughening the surface of the substrate while removing irregularities". In contrast to the presently claimed inventions of presently amended independent claims 1, 3, and 5, the Eichelberger et al. reference merely describes the formation of holes in a polymeric dielectric layers. Such is not the presently claimed inventions.

While it is asserted in the Office Action that scanning is inherent in the Eichelberger et al. reference process, there has been no explanation regarding any reason that scanning is inherently present in the process. Only a mere assertion has been made which is speculative. Applicant requests the citation of prior art to illustrate that scanning is present in any such repair process.

Therefore, presently amended independent claims 1, 3, and 5 are allowable as well as dependent claims 2, 4, and 6 therefrom.

Applicant requests entry of this amendment for the following reasons:

The amendment is timely filed.

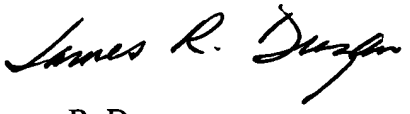
The amendment places the application in condition for allowance.

The amendment does not require any further search or consideration because no claim has been amended.

Applicants submit that claims 1 through 6 are clearly allowable over the cited prior art.

Applicants request the allowance of claims 1 through 6 and the case passed for issue.

Respectfully submitted,



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